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ATTORNEYS FOR THE PLAINTIFFS

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION

RONALD JACKSON, et al.,

Plaintiffs,

vs.

THE BOARD OF TRUSTEES OF WOLF
POINT, MONTANA, SCHOOL
DISTRICT NO. 45-45A, et al.,

Defendants.

Cause No. CV-13-65-GF-BMM-RKS

PLAINTIFFS' MOTION FOR COSTS
AND ATTORNEY'S FEES

Plaintiffs' Motion for Costs and Attorney's Fees

Plaintiffs, as prevailing parties, move the Court pursuant to 42 U.S.C. §§ 1973l(e) and 1988, for an award of costs and attorney's fees. Pursuant to the Proposed Consent Decree filed in this case (Doc. 70), the parties have agreed that any requests by Plaintiffs for costs and fees shall be determined by the Court.

As appears more fully from the attached declarations of James P. Taylor, Jon Ellingson, and M. Laughlin McDonald, which contain detailed summaries of their hours and expenses, Plaintiffs request attorney's fees in the amount of \$179,812.50 for the following number of hours expended in this case by the attorneys noted, at the rates indicated:

	Attorney Hours	Hourly Rate	Amount
James P. Taylor	136	\$200	\$27,200.00
Jon Ellingson	47.25 ¹	\$200	\$9,450.00
	107 ²	\$200	\$21,400.00
Laughlin McDonald	286.5	\$425	\$121,762.50
Total:			\$179,812.50

Plaintiffs also request an award of paralegal fees in the amount of \$1,666.00

¹Time spent as Montana ACLU legal director.

²Time spent as Montana ACLU cooperating attorney.

for the following number of hours expended in this case by Fred McBride at the rate indicated:

	Paralegal Hours	Hourly Rate	Amount
Fred McBride	19.6	\$85.00	\$1,666.00
		Total:	\$1,666.00

Plaintiffs also request an award of costs in the amount of \$14,547.42, as noted:

	Amount
ACLU Voting Rights Project	\$12,128.31
ACLU of Montana	\$1,913.78
Jon Ellingson	\$505.33
Total:	\$14,547.42

WHEREFORE, plaintiffs respectfully pray that this Court enter an award of attorney's fees and costs in the amount of \$196,025.92.

Respectfully submitted,

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/S/Jon Ellingson

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2014, a true and accurate copy of the foregoing Motion For Costs and Attorney's Fees was filed electronically with the Clerk of Court of the U.S. District Court, District of Montana, utilizing the CM/ECF system, which automatically sends email notification of the filing to the attorneys of record.

Respectfully submitted this 14th day of March, 2014

/s/Jon Ellingson

Jon Ellingson
Attorney for Plaintiffs